

JAMES KOUSOUROS
ATTORNEY AT LAW

JAMES KOUSOUROS
FOUNDER & PRINCIPAL

260 Madison Avenue, 22nd floor • New York, NY 10016
212•532•1934 / 212•532•1939 fax
E-mail: James@kousouroslaw.com

EVAN L. LIPTON
COUNSEL

EMMA J. COLE
LEGAL ASSISTANT

February 7, 2024

By ECF

Vernon S. Broderick
United States District Court
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 02/08/2024

Re: *United States v. Mercado (VOSR),*
14 Cr. 654

Dear Judge Broderick:

I represent Franklin Mercado in the above-referenced violation of supervised release hearing. This matter is scheduled for possible plea and sentence on February 14, at 11:00 a.m., with any defense filing due today.

I write, with the consent of the government (A.U.S.A. Balsamello), to respectfully request leave to instead submit my filing on Friday, February 9. The reason for this request is that I have not had the necessary time to meet with my client at the MDC.

Respectfully yours,


Evan L. Lipton

Cc: Gov't counsel (by ECF)